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Christian Copyright
Licensing International, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA
PHOENIX DIVISION**

Christian Copyright Licensing International, LLC,

Plaintiff/Counterdefendant,

vs.

Multitracks.com, LLC,

Defendant/Counterclaimant.

Case No. 2:23-cv-00368-DWL

**PLAINTIFF'S OBJECTIONS
TO DEFENDANT'S
PRETRIAL DISCLOSURES**

Pursuant to Federal Rule of Civil Procedure 26(a)(3)(B), Plaintiff Christian Copyright Licensing International, LLC (“CCL”) objects to the following documentary evidence identified in Multitracks.com, LLC’s (“MTC”) Preliminary Pretrial Disclosure (Doc. 36-1).

1.	All filings and exhibits filed, lodged, or served in the uniform domain name dispute resolution action before Forum having file number FA2211002020063. (Bate Stamped MT000001-MT000230)	Untimely for failure to comply with Case Management Order; for Defendant’s filings only, relevance, hearsay, authenticity, Rule 403
2.	USPTO filings for the MULTITRACKS.COM trademark Application Serial No. 87659447	Untimely for failure to comply with Case Management Order; relevance, hearsay, authenticity, Rule 403
3.	Accounting documents reflecting amounts expended on marketing using Multitracks.com trademark from 2013 to present. (MT00596-602)	Untimely for failure to comply with Case Management Order; hearsay, foundation, Rule 1006
4.	YouTube videos from artist endorsements (available at https://www.multitracks.com/sessions/)	Untimely for failure to comply with Case Management Order; relevance
5.	Consumer Communications stamped MT00325-00497 (produced as Confidential—Counsel’s Eyes Only)	Untimely for failure to comply with Case Management Order; relevance, hearsay, authenticity, Rule 403
6.	Consumer Group Facebook Messages stamped MT000498-000595 (produced as Confidential—Counsel’s Eyes Only)	Untimely for failure to comply with Case Management Order; relevance, hearsay, authenticity, Rule 403
7.	Ross MultiTracks.com receipt—Ross Deposition Ex. 17	Untimely for failure to comply with Case Management Order; relevance
8.	Go Daddy Whois information—Ross Deposition Ex. 19	Untimely for failure to comply with Case Management Order
9.	Resource Websites—Ross Deposition Ex. 22	Untimely for failure to comply with Case Management Order; relevance, hearsay, authenticity
10.	Any document identified by Plaintiff	No objection.
11.	Any expert report and supporting data	All objections reserved, given that Defendant has not yet disclosed any expert reports or supporting data.

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Dated: April 1, 2024

Loeb & Loeb LLP

By: /s/ Andrew M. Hutchison

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Attorneys for Plaintiff

Christian Copyright

Licensing International, LLC